

1 Stephen G. Larson (SBN 145225)  
*slarson@larsonllp.com*

2 Hilary Potashner (SBN 167060)  
*hpotashner@larsonllp.com*

3 Jonathan Gershon (SBN 306979)  
*jgershon@larsonllp.com*

4 **LARSON LLP**  
555 South Flower Street, 30th Floor  
5 Los Angeles, California 90071  
6 Tel: (213) 436-4888  
Fax: (213) 623-2000

7 Attorneys for Defendant  
JASON EDWARD THOMAS CARDIFF

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JASON EDWARD THOMAS  
15 CARDIFF,

16 Defendant.  
17

Case No. 5:23-cr-00021-JGB

**REQUEST FOR JUDICIAL  
NOTICE IN SUPPORT OF JASON  
CARDIFF'S *EX PARTE*  
APPLICATION FOR AN ORDER  
TRANSFERRING CASE TO THE  
HONORABLE DOLLY M. GEE**

*[Filed concurrently with Ex Parte  
Application; Declaration of Stephen G.  
Larson; and [Proposed] Order]*

1 **I. DEFENDANT’S REQUEST FOR JUDICIAL NOTICE**

2 Pursuant to Rule 201 of the Federal Rules of Evidence, Jason Cardiff hereby  
3 requests that the Court take judicial notice of the following attached documents,  
4 which are submitted in support of his *ex parte* application for an order transferring  
5 this case to the Honorable Dolly M. Gee.

6 1. Attached hereto as **Exhibit 1** is a true and correct copy of the  
7 Complaint for Permanent Injunction and Other Equitable Relief filed in *FTC v.*  
8 *Jason Cardiff, et al.*, 5:18-cv-02104-DMG-PLA (C.D. Cal) (“FTC Action”) on  
9 October 10, 2018. [ECF No. 1].

10 2. Attached hereto as **Exhibit 2** is a true and correct copy of the Stipulated  
11 Protective Order filed in the FTC Action on September 24, 2019. [ECF No. 219].

12 3. Attached hereto as **Exhibit 3** is a true and correct copy of the Final  
13 Judgment Including Permanent Injunction as to Defendants Jason Cardiff and  
14 Eunjung Cardiff filed in the FTC Action on March 1, 2022. [ECF No. 706].

15 4. Attached hereto as **Exhibit 4** is a true and correct copy of the Order  
16 Approving the Receiver’s Final Report and Accounting, and the Receiver’s Final  
17 Fee Application filed in FTC Action on September 30, 2022. [ECF No. 716].  
18

19 **II. THE COURT SHOULD TAKE JUDICIAL NOTICE OF EXHIBITS 1**  
20 **THROUGH 4**

21 Under Rule 201, “[t]he court may judicially notice a fact that is not subject to  
22 reasonable dispute because it: . . . (2) can be accurately and readily determined from  
23 sources whose accuracy cannot reasonably be questioned.” As such, Courts may  
24 take judicial notice of court records. *See U.S. ex rel. Robinson Rancheria Citizens*  
25 *Counsel v. Borneo, Inc.*, 971 F.2d 244, 248 (9th Cir. 1992) (“Courts regularly take  
26 judicial notice of ‘proceedings in other courts, both within and without the federal  
27 judicial system, if those proceedings have a direct relation to matters at issue.’”)  
28

(citations omitted)). Accordingly, since Exhibits 1 through 4 are documents which were filed in the FTC Action, they are subject to judicial notice.

**III. CONCLUSION**

Based on the foregoing, Mr. Cardiff respectfully requests that the Court take judicial notice of the documents referenced herein.

Dated: December 22, 2023

LARSON LLP

By: /s/ Stephen G. Larson

Stephen G. Larson

Hilary Potashner

Jonathan Gershon

Attorneys for Defendants JASON  
EDWARD THOMAS CARDIFF